

Exhibit G



ATLANTA

CLEVELAND

DAYTON

WASHINGTON, D.C.

CINCINNATI

COLUMBUS

NEW YORK

VIA EMAIL

May 17, 2018

Rebecca Mermelstein, Esq.
Amanda Kramer, Esq.
Jessica Greenwood, Esq.
Assistant United States Attorneys
United States Attorney's Office
Southern District of New York
1 St. Andrews Plaza
New York, New York 10007

Re: United States v. David Middendorf
18 Cr 36 (JPO)
Defendant Cynthia Holder's Supplemental Request for
Discovery Pursuant to Fed. R. Crim. P. 16(a)(1)(E)(i), (ii)

Dear Ms. Mermelstein, Ms. Kramer and Ms. Greenwood:

Please accept this letter as a supplemental request on behalf of defendants David Middendorf, David Britt, Thomas Whittle and Cynthia Holder for discovery pursuant to Fed. R. Crim. P. 16(a)(1)(E)(i) and (ii). Please provide the following:

1. All documents reflecting and/or relating to the "time and expense involved in" the creation of the PCAOB's inspection lists, "which requires full-time work by numerous employees over weeks at a time each year," Government Brief in Opposition to Defendants' Motions to Dismiss the Indictment, at 37, including, but not limited to, the "time and expense involved in" the creation of the PCAOB's 2015, 2016 and 2017 inspection lists for KPMG.
2. All documents reflecting and/or relating to the "significant expense" and "time and effort," *id.* at 38, incurred by the PCAOB which was caused by its re-creation of the KPMG inspection list for 2017 following its discovery that the original 2017 inspection selections allegedly had been improperly obtained by the defendants.

The government has represented that it anticipates and expects that it will call witnesses from the PCAOB to give trial evidence concerning the above subjects. *Id.* at 37-38. Accordingly, documents concerning those subjects, which have not previously been supplied to the defense, are material to the preparation of our defense and/or constitute evidence the government intends to use in its case-in-chief at trial.

3. In addition, please provide all documents reflecting or demonstrating that "the PCAOB's confidential selection information was of financial value . . . in the hands of the KPMG employees who wrongfully obtained it . . ." *Id.* at 37. Again, documents concerning this representation, which have not previously been supplied to the defense, are material to the



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preparation of our defense and/or constitute evidence the government intends to use in its case-in-chief at trial.

Inasmuch as additional defense motions are due to be filed by May 25, 2018, please respond to the above requests as soon as possible.

Thank you.

Very truly yours,

A handwritten signature in blue ink, appearing to read "N.A. Bloch".

Norman A. Bloch

cc: All Counsel (via email)